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United States Department of Homeland Security

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

GONZALES & GONZALES BONDS
AND INSURANCE AGENCY, INC.,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendant.

Case No. C 11-02267 DMR

Honorable Donna M. Ryu

**STIPULATION AND [REDACTED]
ORDER EXTENDING THE DEADLINE
FOR PLAINTIFF TO FILE MOTION FOR
ATTORNEY'S FEES AND BILL OF
COSTS**

1 Plaintiff Gonzales & Gonzales Bonds and Insurance Agency, Inc. (“G&G” or
2 “Plaintiff”) and Defendant United States Department of Homeland Security (“DHS”), by and
3 through their respective counsel, make the following representations and stipulate and agree as
4 follows:

5 G&G and DHS have agreed in principle to a settlement regarding G&G’s motion for
6 attorney’s fees and bill of costs based on the Court’s Order of December 21, 2012, which ruled
7 upon the parties’ motions for summary judgment in this Freedom of Information Act case.
8 The parties are currently working on formalizing the settlement in writing.

9 The current filing deadline for the motion and bill of costs is July 17, 2013. The parties
10 agree that an extension to August 2, 2013 should allow for enough time to enter into a written
11 settlement agreement. The parties therefore respectfully request that the Court approve this
12 requested extension.

13 This is the seventh requested extension of the original January 4, 2013 deadline.

14 DHS’ deadline for filing opposition to G&G’s motion for attorney’s fees and bill of
15 costs would continue to be 30 days from the filing of G&G’s motion and bill of costs.

16 The requested extension would not affect the schedule for the case.

17 Nothing herein shall constitute a waiver of DHS’ right to oppose or object to G&G’s
18 motion for attorney’s fees and bill of costs.

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2
3 Dated: July 8, 2013

Respectfully submitted,

ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

4 /s/ David R. Ginsburg

5 Gary A. Nye

6 David R. Ginsburg

7 Attorneys for Plaintiff

Gonzales & Gonzales Bonds and Insurance

Agency, Inc.

8
9
10 Dated: July 8, 2013

Respectfully submitted,

MELINDA HAAG

United States Attorney

11
12 /s/ Ann Marie Reding

13 ANN MARIE REDING

14 Assistant United States Attorney

Attorneys for Defendant

Department of Homeland Security

[PROPOSED] ORDER

Pursuant to the stipulation by the parties, the Court extends from July 17, 2013 to August 2, 2013, the deadline for G&G to file its motion for attorney's fees and its bill of costs. DHS' deadline to file opposition to G&G's motion for attorney's fees and bill of costs will remain 30 days from the filing of G&G's motion and bill of costs.

IT IS SO ORDERED.

Dated: July 10, 2013



THE HONORABLE DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE